

194549

STATE OF SOUTH CAROLINA

(Caption of Case)

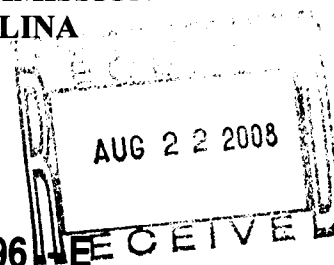
The Combined Application of South Carolina  
Electric and Gas Company for a Certificate of  
Environmental Compatibility and of Public  
Convenience and Necessity for a Base Load Review  
Order for the Construction of a Nuclear Plant in  
Jenkinsville, SC

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2008 - 196



(Please type or print)

Title:

Submitted by: Pamela Greenlaw

SC Bar Number: N.A.

Address: 1001 Wotan Rd

Telephone: 803-736-2977

Columbia, SC 29229

Fax:

Other:

Email:

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

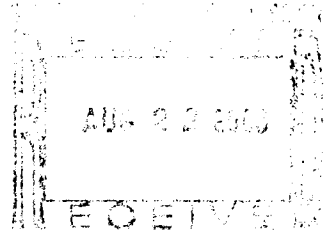
☒ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input checked="" type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

1001 Wotan Road  
Columbia, SC 29229  
August 20, 2008

The Honorable Charles Terreni  
Chief Clerk/Administrator  
South Carolina Public Service Commission  
101 Executive Drive  
Post Office Drawer 11649  
Columbia, South Carolina 29211



Re: A Letter in support of the suggested alternate timeline proposed by Scott Elliott;  
Also, a Request to Be Listed as a Witness Pending the Acquisition of Expert Witnesses Who  
Can in My Stead Offer Testimony and Exhibits in All Proceedings on Docket # 2008-196-E,  
The Combined Application of South Carolina Electric and Gas Company for a Certificate of  
Environmental Compatibility and of Public Convenience and Necessity for a Base Load Review  
Order for the Construction and Operation of a Nuclear Facility in Jenkinsville, South Carolina

Dear Mr. Terreni,

As a customer of SCE&G I petition the Public Service Commission to grant my request to be listed as a witness until such time as I may find an Expert Witnesses in My Stead for the above established Docket # 2008-196-E in any and all hearings and proceedings before the Public Service Commission. The reason for my request is that as a lay person I have not had sufficient time to locate persons with expertise in the many, wide-ranging matters relevant to this docket and am seeking to find such persons. One difficulty is my lack of ability to offer remuneration to such experts for their time. The current process is skewed severely in the direction of the well-heeled.

If I cannot secure expert witnesses, I intend as a witness to prove that SCE&G has not done its due diligence in complying with particular points of the laws nor with the spirits of these same laws governing electric energy policy and environmental impacts in South Carolina. I also intend to show that SCE&G has not included in its analyses the cumulative effects their proposed plant and of other power plant, existing and proposed, on the Broad River and the downstream effects of all the power plants, not only the one proposed by SCE&G. Finally I intend to prove that Because I will be using existing laws and policies already easily accessed by all the Parties of Record and because I cannot afford to make and supply copies, I am not able at this time to include copies to submit but simply request that the Parties examine the existing body of laws and inherent goals contained in the Energy Policy Act.

As other persons have stated, the volume and complexity of matter to be examined for this Docket is so immense, I ask that the PSC grant the alternate schedule requested requesting by Mr. Elliott and supported by the ORS, as well as by all the other parties who have written in the same. I will in the alternate schedule proposed be able to submit specific testimony and exhibits. Everyone needs to have sufficient time to examine, analyze, and discuss the massive amount of information. The results of this hearing and the subsequent decisions and ruling by the PSC on this Docket will forever change the economy and the environment of South Carolina. There will be irrevocable consequences that our children will inherit, and we owe it to the unborn a hopeful future.

I am serving all other parties of record with a copy of this letter request and a copy of the certificate of service.

Sincerely,

Pamela Greenlaw

STATE OF SOUTH CAROLINA

Docket # 2008-196-E )  
)  
The Combined Application of South Carolina )  
Electric and Gas Company for a Certificate of )  
Environmental Compatibility and of Public )  
Convenience and Necessity for a Base Load )  
Review Order for the Construction and Operation )  
of a Nuclear Facility in Jenkinsville, South Carolina )

CERTIFICATE OF  
SERVICE

By this Certificate of Service, I certify that I have caused to be served to the Parties of Record a copy of my letter to the PSC containing two requests: one, that the PSC allow me to be a witness until such time as I can find expert witnesses, and two, that the PSC grant Mr. Elliott's request to establish his suggested new time line for the hearing proceedings. On I August 20 I mailed copies to the legal counsels. I delivered by hand copies of the letter and certificate to the other parties of record.



Service List of Parties of Record:

Nanette Edwards, Counsel

Leslie Minerd

Shannon Bowyer Hudson, Counsel  
K. Chad Burgess, Senior Counsel  
Belton T Zeigler, Counsel  
Mitchell Willoughby, Counsel  
Scott Elliott, Counsel  
E.Wade Mullins, III, Counsel  
Damon E. Xenopoulos, Esquire,  
Robert Guild, Counsel

Mildred McKinley  
Joseph Wojcicki  
Lawrence Newton

Maxine Warshauer